

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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UNITED STATES,

Plaintiff,

v.

No. 23-20191

DEMETRIUS HALEY,

Defendant.

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UNOPPOSED MOTION TO EXTEND MOTION DEADLINE

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Comes now the defendant, Demetrius Haley, by and through his counsel of record, Michael J. Stengel, Esq., and, without opposition, moves this court to extend the deadline for him to file motions. In support thereof, Mr. Haley would show:

1. This court has previously set November 6, 2023 as the deadline for the United States to furnish discovery and the defendants to file pretrial motions. (R. 51, Scheduling Order).

2. Mr. Haley has diligently reviewed the discovery produced to date and been in communication with the prosecution about the status of discovery. The government has informed counsel that it views the discovery process as virtually complete. Counsel would note that the November 2, 2023 disclosures included over 37,000 pdf pages and about 316 hours in run time of audio and video.

3. Counsel needs time to review the discovery produced in order to determine whether a factual and legal basis to file motion(s) exists, enabling him to both provide Mr. Haley the effective assistance of counsel to which he is constitutionally entitled and to comply with the Tennessee Rules of Professional Conduct.

4. Consistent with L.Crim.R. 12.1(a), counsel discussed a 30 day extension, through and including December 6, 2023, with the government prior to receiving the November 2, 2023 production. At that time counsel learned that the government didn't object to such extension.

5. In view of the voluminous production within the past four days, counsel would suggest that the court grant an extension of the motion deadline and discuss necessary revisions to the scheduling order at the November 14, 2023 report. Indeed, a December, 2023 report may be necessary to discuss the status of trial preparation after defense counsel has had an opportunity to digest the November 2, 2023 production.

Respectfully submitted,

S/Michael J. Stengel

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Certificate of Service

I hereby certify that I have served a copy of the foregoing Motion to Extend Motion Deadline by electronic means, via the Court's electronic filing system, on AUSA's David Pritchard, Libby Rogers, Kathryn Gilbert, and Forrest Christian this 6th day of November, 2023.

S/Michael J. Stengel